

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
AS WIND DOWN LLC (f/k/a Avenue Stores, LLC), et al,)	Case No. 19-11842 (LSS)
)	
Debtors.)	(Jointly Administered)
)	
DAVID W. CARICKHOFF, TRUSTEE,)	
)	
Plaintiff,)	Adversary No. 21-50454
v.)	
)	Re: Docket Nos. 1, 2 and 4
SOHO APPAREL LTD,)	
)	
Defendant.)	
)	

PLAINTIFF’S REQUEST FOR ENTRY OF DEFAULT

Plaintiff, David W. Carickhoff, in his capacity as Chapter 7 Trustee (the “Plaintiff”), for the above-captioned debtors (the “Debtors”) by and through its undersigned counsel, hereby requests that a default be entered against defendant Soho Apparel LTD (“Defendant”), in the above-captioned adversary proceeding based on the details of the *Declaration of Counsel in Support of Plaintiff’s Request for Entry of Default* (the “Declaration”) filed concurrently herewith, and the *Adversary Complaint for Avoidance and Recovery Preferential Transfers Pursuant to 11 U.S.C. §§ 547 & 550 and Objection to Scheduled Claims*, with accompanying *Summons* and *Certificate of Service*, attached to the Affidavit as Exhibit 1. A form of *Entry of Default* is attached hereto as Exhibit A.

Dated: October 14, 2021

/s/ Peter J. Keane

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*Special Counsel to Plaintiff, David W. Carickhoff,
Chapter 7 Trustee for the Estates of AS Wind Down
LLC, et al.*